

IN THE UNITED STATES DISTRICT COURT
FOR THE

NORTHERN DISTRICT OF CALIFORNIA **FILED**

JUN 29 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANIEL GONZALEZ, et al.
Plaintiffs

X
X Case No.

X
X 19-CV-07423-JSC

V.

GREGORY J. AHERN, et al.
Defendants

X
X Declaration of

X
X Keith H. Washington

X
X AKA "Malik"

X
X PFN# UME239

X
X Santa Rita Jail (SRJ)

Keith H. Washington AKA 'Malik' here-by
declares that I am a Federal Pre-trial
detainee currently housed at the Santa
Rita Jail located in Dublin, California.
I have been housed at SRJ since
March 21st, 2022. During my time
here I have been housed in the
Restrictive Housing Unit between
Housing Unit 1 and Housing Unit 2.

*I have serious concerns regarding this
Courts recent rulings in Gonzalez.*

A.Courts Denial of Inadequate Medical Care.

On May 9th, 2023 this Honorable Court Denied Certification of the Sub Class at SRJ which seeks relief regarding Inadequate Medical Care. I was very troubled and disappointed by the Court's decision.

On page 11 paragraph (C) the Court Said: "plaintiff must come forward with "Significant proof" his claims can be proved on a class wide basis." end of quote.

The Court continued down this path and stated: "Plaintiffs' anecdotal evidence fails to demonstrate" there are in fact common questions of law or fact", end of quote.

Declaration cont...

19-cv-07423-JSC

A.

Courts Denial of Inadequate Medical Care.

Cont...

Lastly the Court said: "Plaintiffs have not presented any cohesive theory regarding inadequate access to medical care..." end of quote

I state for the record that since my arrival here 8(eight) human beings have died at this jail. They came from different ethnic groups, races and genders.

In-order for this Court, prospective Class Counsel and the public to grasp the gravity of this situation and to understand our Cognizable Theory regarding WellPaths culpability

I direct the Court's attention to:

Destination-Freedom.org/SRJ-Freedom-Collective

PLEASE VISIT THIS WEB-SITE!!

A.

Courts Denial of Inadequate Medical Care.

Cont.....

The website contains PDFs which when clicked on and opened will provide this Honorable Court with a plethora of Factual evidence and accounts regarding WellPath, Aramark as well as conditions of confinement inside Santa Rita Jail.

I will provide this Court with the names of specific articles (PDFs) so that your search will be EASY.

- 1.) How many more of us must die before DOJ intervenes at the Santa Rita Jail.
- 2.) Spike in Deaths at Santa Rita Jail deserve heightened attention.
- 3.) The Art of Deception and Retaliation tactics by ACSO at Santa Rita Jail.

Please Visit:

Destination-Freedom.org/SRJ-Freedom-Collective

Declaration cont...

19-cv-07423-JSC

A.

Courts Denial of Inadequate Medical Care
Cont...

I believe the Court was correct in ORDERING Co-Counsel to join Attorney Huang. The Class is numerous and the civil and human rights violations at Santa Rita Jail can be overwhelming at times. (Attorney Huang Fights Hard For us!)

One issue that appears to have been ignored by this Court is the on-going practice by the Defendants to harass and Retaliate Harshly against prisoners who engage in "Protected Conduct"- Protected expression or who dare to engage in Free Speech activities critical of the Alameda County Sheriff's Office or the Santa Rita Jail. THIS IS A VALID ISSUE THAT AFFECTS US ALL!!

Declaration cont....

19-cv-07423-JSC

(B.)

PRAYER FOR RELIEF

WHEREFORE plaintiff (class Member) Keith H. Washington PRAYS this Court ORDER:

- 1.) A Fact Finding Study by Expert Monitors in-order to ascertain the correlation between Deaths at Santa Rita Jail and Deliberate Indifference and Neglect by WellPath Management, Inc. [The horrific Death Rate should be more than enough 'Anecdotal Evidence'. Our Lives MATTER!]

Notes: Since 2014 67 (sixty seven) human beings have died at this Jail. WellPath Must Not be allowed to evade Judicial Review.

I declare under penalty of perjury that the foregoing is true and correct, executed on June 24th, 2023 at Dublin, California.

x Keith H. Washington

Keith H. Washington "Malik"
PFN# UME239
Santa Rita Jail

To: Clerk of Court

Northern District of California

From: Keith H. Washington

PFN# UME239

Santa Rita Jail

5325 Broder Blvd.

Dublin, CA 94568

Re: Declaration

Case# 19-cv-07423-JSC

Dear Clerk, please File this Declaration under Gonzales case ASAP. Thank you and ask the Courts Administrator to visit:

Destination-Freedom.org/SRJ-Freedom

Google: Collective

Santa Rita Jail Freedom

~~Keith H. Washington~~ "Malik" Collective!

Keith H. Washington
PFN# UME239
Santa Rita Jail
5325 Broder Blvd.
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OAKLAND CA 945

27 JUN 2023 PM 3 L



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United States Courthouse
Attn: Clerk of Court
1301 Clay Street, Suite: 4005
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SANTA RITA JAIL
6325 BROOKLYN BLVD.
DUBLIN, CA 94568